



Instructions for Use of Act 64 Disposal Facility Inspection Form

This form is divided into three parts. Form A covers the items to be inspected in the "office". This portion is the administrative portion of the inspection and involves inspecting records and files and obtaining certain information from the facility. Form B covers the visual facility inspection requirements and includes some verification of information obtained in Form A as well as inspecting the actual operations and integrity of the facility. Form C is the portion which the inspector must prepare BEFORE going to conduct the inspection and will consist of questions (both administrative and visual) relating to special license conditions specific to that facility, such as special monitoring, recordkeeping or upgrading.

This inspection form supersedes all previous inspection forms and is to be used for conducting all hazardous waste disposal facility inspections conducted under Act 64. The RCRA facility inspection form must still be used for conducting RCRA compliance inspections. If the facility is also a transporter or generator, such an inspection should also be done, if possible, using the appropriate inspection forms. However, generator inspections can only be done by RCRA certified inspectors using the RCRA generator inspection form and the inspection so identified before it begins.

If this inspection indicates that the licensed facility is in closure or post-closure, a closure or post-closure inspection should be done using the appropriate inspection form.

PLEASE NOTE: This form provides for the inspection of both long-term storage and short-term storage at disposal facilities. In the administrative section (Form A), these requirements are combined into one section on storage since the same administrative requirements apply to both activities. In Form B, storage questions are separated into a short-term storage section with the long-term storage questions part of the specific disposal facilities standards portion. Storage may ONLY be conducted in containers or tanks. Any other type of storage is a violation of Act 64. Regarding the visual inspection, complete the short-term storage section only if short-term storage is done on site. If only long-term storage is done, complete the storage section in Form A and the appropriate facility standard portion in Form B. Always complete a Form C.

Long-term storage may only be done in containers or tanks. Storage in waste piles, surface impoundments or other means is not permitted under Act 64. Surface impoundments or waste piles may only be used for treatment of hazardous waste.

A response to ALL questions under the particular type of facility should be provided. If a mark is placed in the non-shaded answer space, an explanation should be given to fully explain the answer. If N/A (not applicable) is marked, explain in the remarks why not. N/A should only be marked if you have not checked the requirement. If you do check on the matter involved in the question, but the information is unavailable, you should so indicate. Do not indicate N/A in such instances.



Attached for your reference are copies of the National Fire Protection Association Flammable and Combustible Code tables which are referenced in this form. Further information regarding these tables or the code are available from any office of the State Fire Marshall of the Michigan State Police.

SP:clp

ACT 64 DISPOSAL FACILITY INSPECTION REPORT

FORM A: Administrative
FORM B: Visual
FORM C: Special Conditions

EPA Identification Number: M I D 0 0 5 3 5 8 1 3 0

Installation Name: Total Refinery

Location Address: Alma

Mailing Address: _____

City: Alma

State: Mich.

Date of Inspection: 12-9-83

Time of Inspection: (from) 8:45 (to) 2:30

Persons Interviewed:

Ben White

Title:

Telephone:

Inspector(s)

Robert Basch

Leroy Vahovic

Agency/Title

Telephone

Installation Activity: (check all that apply)

- ☒ Treatment
- ☐ Long Term Storage
- ☐ Short Term Storage (less than 1 year)
- ☐ Disposal
- ☒ Transporter
- ☒ Generator

Disposal Activity:

- ☐ Storage:
 - ☐ Containers
 - ☐ Tanks
- ☒ Treatment
 - ☐ Chemical, Physical, Biological (examples: reaction vessels, tanks, etc.)
 - ☒ Land Treatment
 - ☐ Waste Piles
 - ☐ Surface Impoundments
- ☐ Landfills
- ☐ Incineration and/or Thermal Treatment

7-2-82

1. Check on status of lagoon sludge
level, how water
2. Improper label on truck



FORM A: ADMINISTRATIVE

YES NO NA* REMARKS

I. General Facility Standards

A. Has the Regional Administrator and/or Department been notified as appropriate regarding:

1. Receipt of hazardous waste from a foreign source? (40 CFR 265.12(a))

☒ ☐ ☐ _____

2. Facility expansion or transfer of ownership? (40 CFR 265.12(b)) (R 507(1))

☒ ☐ ☐ _____

B. General Waste Analysis (40 CFR 265.13) (R 405(6))

1. Has the owner/operator obtained a detailed chemical and physical analysis of the waste they handle? (40 CFR 265.13(a))

☒ ☐ ☐ _____

2. Does the owner/operator have a detailed waste analysis plan on file at the facility? (40 CFR 265.13(b))

☒ ☐ ☐ _____

3. Does the waste analysis plan specify procedures for inspection and analysis of each shipment of hazardous waste from off-site sources? (40 CFR 265.13(c))

☐ ☐ ☒ _____

4. Are all treated wastes, residuals, or byproducts from a treatment process evaluated to determine whether they are hazardous waste? (R 425(9))

☒ ☐ ☐ _____

C. Site Security (R 406)

1. Does security measures include controlled entry to the facility? (R 406(1))

☒ ☐ ☐ _____

D. Personnel Training (40 CFR 265.16)

1. Do personnel training records include: (40 CFR 265.16(d))

*NA should be followed by a remark.

	YES	NO	NA*	REMARKS
a. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Job descriptions?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	- Only for general hazard
d. Records of training received?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In personnel file
2. Have all employee training records been maintained for at least three years after the final date of employment? (40 CFR 265.16(e))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In personnel file
3. Was required personnel training received by 5-19-81?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Do new personnel receive required training within six months? (40 CFR 265.16(b))	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Need to develop a company policy and document that each employee has received training

II. Spill & Accident Prevention Plan: (R 407)

A. Has the owner/operator developed a spill and accident prevention plan? (R 407(2))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
B. Does the spill and accident prevention plan include the following: (R 407(3))				
1. Surveillance procedures & schedules?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Routine maintenance procedures & schedules?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Equipment & facility inspection procedures & schedules?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Employee training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Need to include exist training program in plan
5. Emergency secondary containment provisions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
C. Preparedness & Prevention: (40 CFR 265.30) (R 407)				
1. Has the owner/operator established Testing & Maintenance Procedures for Emergency Equipment? (R 407(c)(c)) (40 CFR 265.33)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*NA should be followed by a remark.

YES NO NA* REMARKS

2. Is the water and/or foam available for fire control at adequate volume & pressure? (R 407(3)(b)&(c) (40 CFR 265.32(d))

☒ ☐ ☐ _____

D. General Inspection Requirements:
(40 CFR 265.15)

1. Does the owner/operator inspect their facility for the following: (40 CFR 265.15(a)) (R 407(3)(a)(b)(c))

a. Malfunctions?

☒ ☐ ☐ _____

b. Deterioration?

☒ ☐ ☐ _____

c. Operator errors?

☒ ☐ ☐ _____

d. Unauthorized discharges?

☒ ☐ ☐ _____

2. Has the owner/operator developed a written inspection schedule for the following: (40 CFR 265.15(b)1) (R 407 (3)(a)(b)(c))

a. Monitoring equipment?

☐ ☐ ☐ _____

b. Safety & emergency equipment?

☐ ☐ ☐ _____

c. Security devices?

☐ ☐ ☐ _____

d. Operating & structural equipment?

☐ ☐ ☐ _____

3. Does the owner/operator maintain an inspection log? (40 CFR 265.15(d))

☒ ☐ ☐ _____

- E. Has a current copy of the spill and accident prevention plan been filed with the department? (R 407(4))

☒ ☐ ☐ _____

- F. Have employees been trained in the provisions of the plan? (R 407(5))

☐ ☒ ☐ _____

III. Contingency Plan

- A. Is a current copy of the contingency plan readily accessible on site to employees at the facility? (R 408(4))

☐ ☐ ☒ _____

*NA should be followed by a remark.

*✓ No office space,
not needed since
is a hard foam
is available at the
plant offices*

YES NO NA* REMARKS

B. Does the contingency plan contain the following: (R 408(2))

1. An appropriate list of emergency contacts and notification procedures in the event of an emergency and arrangements agreed to by those agencies? (R 408(2)(a)) (40 CFR 265.52(c))

✓

2. A list, description, and location of all emergency equipment and power sources available? (R 408(2)(b))

✓

As in the SPCC plan and will be incorporated

3. An outline of emergency procedures for fires, explosions, and release of hazardous waste? (R 408(2)(c))

✓

4. An employee training program? (R 408(2)(d))

✓

will be done

5. An appropriate list of names and their phone numbers for responsible individuals? (R 408(2)(e))

✓

6. An evacuation plan? (R 408(2)(f))

✓

7. Potential disposal methods for spilled hazardous waste, hazardous waste components, and contaminated cleanup materials? (R 408(2)(g))

✓

C. Does the owner/operator review the contingency plan on an annual basis? (R 408(3))

✓

1st year he had the plan

D. If necessary, has the contingency plan been revised? (R 408(3)) (40 CFR 265.54)

✓

- new plan

E. Has the owner/operator attempted to make emergency arrangements with local authorities for their services in the event of an emergency? (40 CFR 265.37)

✓

not for hazardous waste

F. Have copies of the contingency plan been submitted to local emergency organizations? (40 CFR 265.53)

✓

submitted but not referenced in letter of Transmittal

G. Emergency Coordinator: (40 CFR 265.55)

1. Are the facility emergency coordinators identified?

✓

*NA should be followed by a remark.

Make consolidated material into a contingency plan

	YES	NO	NA*	REMARKS
2. Is a facility emergency coordinator available at all times? (Now)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are the emergency coordinators familiar with all aspects of site operations and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Does the emergency coordinator have the authority to carry out the contingency plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
H. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures of the contingency plan? (40 CFR 265.56)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No h.w. Emergency

IV. Recordkeeping

A. Manifests: - no waste manifested to soil farm, one manifest for waste shipped to Wayne Ship - OK

1. Are manifests completed properly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are manifests for past shipments retained for three years? (40 CFR 265.71(s))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the owner/operator follow the requirements regarding manifest discrepancies? (40 CFR 265.72)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

B. Operating Log:

1. Does the owner/operator keep an operating log at each disposal facility? (R 901(1))	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Information available but not assembled in an operating log
2. Is all information that is reported in the operating log recorded within the required time? (R 901(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the operating log contain:				
a. A record of the manifest and certification of disposal numbers? (R 901(2)(a))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	don't manifest land farm waste
b. <u>OR</u> all of the following:				
(1) the hazardous waste number?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	will include in existing records

*NA should be followed by a remark.

	YES	NO	NA*	REMARKS
(2) the volume or weight of the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(3) Results of all analysis and test performed on the waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	in another book
(4) Methods for treatment, storage, and/or disposal of each waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
(4) Dates for each occurrence?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Results of all monitoring activities required by the company's operating license. (R 901(2)(b))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	in file, in book of book
d. The quantity and location of each hazardous waste within the facility? (40 CFR 265.73(b)(2))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Reports detailing all incidents that required implementation of the contingency plan? (R 901(2)(d))	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	none yet
f. Records of managed hazardous waste shipments rejected by the facility (R 901(2)(e))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
g. Records related to surcharge fees as required by R 299.7001(5)? R 901(2)(f)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
h. Any other records required to be kept by the operating license. (R 901(2)(5)) (Inspector - see special conditions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
i. Records and results of inspections. (40 CFR 265.73(b)(5))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	kept in log - Bernard Stamen book
j. All closure and postclosure cost estimates under 265.142 and 144? (40 CFR 265.73(b)(7))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
k. Does the owner/operator issue a certificate of disposal for each shipment of managed hazardous waste received within 10 days after disposal is completed? (R 906)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

*NA should be followed by a remark.

YES NO NA* REMARKS

C. Annual Reports: (40 CFR 265.75)

1. Does the owner/operator submit annual reports as required? (40 CFR 265.75)
2. Do the annual reports contain the information required under 40 CFR 265.75?

1st report will be submitted by 3-1-84

V. Closure and Post Closure

- A. Has the closure plan been submitted to the Regional Administrator? (40 CFR 265.112(c))
- B. Has the plan been updated as required? (R 410(3))
- C. Has closure begun? (40 CFR 265.112(c))
- D. Are partial closures occurring?
- E. Has closeout notification been given as required by R 601(1)?
- F. What is anticipated date of closure?
- G. Has the owner/operator submitted a post-closure plan to the Regional Administrator? (40 CFR 265.118(c))
- H. Has the plan been updated as required? (R 411(3))

not planning to close

don't plan to close

not planning to close

VI. Storage (Short term and/or long term)**

NA

- A. Does the facility short term store? (Less than or equal to one year)
- B. Does the facility long term store? (More than one year)
- C. Has the facility complied with the notification requirements under R 708?
- D. Are areas of short term storage physically inspected twice a month? (R 703)

*NA should be followed by a remark.

**Complete Section VI only if applicable.

YES NO NA* REMARKS

*** E. Does the facility maintain an accurate written inventory including: (R 705(a))

1. Quantities of waste (into/out of storage?)
2. Physical measurement of stored wastes?
3. Comparison of quantities from (1) vs physical measurement from (2) (twice monthly)?
4. Any discrepancies the comparisons in (3) may show?
5. Results of inspections and monitoring?
6. Leachate analysis (under ground storage only - minimum once per year)?

F. Have any releases occurred which exceed the containment area? (R 706)

G. Have any releases occurred within the containment area, but subject to report? (R 706)

H. Have the reports as required by R 706 pertaining to releases been filed?

VII. Special Conditions

A. Has the owner/operator complied with the special requirements of their operating license?

(INSPECTOR: Answer must be based on the results of Form C which you prepared prior to investigation, from special conditions specific to this facility.)

VIII. Facility Standards: (40 CFR 265, Subparts I through R) (R 401-429, 701-710)

I. Use & Management of Containers:
(Subpart I and Part 7 rules)

NA

(INSPECTOR: Make sure Section VI has been completed if facility has storage.)

1. Are containers inspected weekly for leaks and defects? (40 CFR 265.174)

*NA should be followed by a remark.

***Except as provided in R 710.

YES NO NA* REMARKS

J. Tanks:
(Subpart J and Part 7 rules)

NA

(INSPECTOR: Make sure Section VI has been completed if facility has storage.)

1. Are waste analyses done before the tanks are used to store, treat or process a substantially different waste than before? (40 CFR 265.193(a))
2. Are required daily and weekly inspections done? (40 CFR 265.194)
3. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? (40 CFR 265.198(b))

Tank Capacity: _____ gallons
Tank Diameter: _____ feet
Distance of tank from property line: _____ feet

(See Tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Code - 1977" to determine compliance)

K. Surface Impoundments: (Subpart K)

NA

1. Are waste analyses done when impoundment is used to treat a substantially different waste than before? (40 CFR 265.225(a))
2. Is the freeboard level inspected at least daily? (40 CFR 265.226(a))
3. Are dikes inspected weekly for evidence of leaks or deterioration? (40 CFR 265.226(a)(2))
4. Are reactive and ignitable wastes rendered non-reactive or non-ignitable before treatment? (40 CFR 265.229(a)(1))

L. Waste Piles: (Subpart L)

NA

(INSPECTOR: Waste piles may not be used for storage -- only treatment.)

*NA should be followed by a remark.

	YES	NO	NA*	REMARKS
1. Is each incoming shipment of waste analyzed before being added to the waste pile? (40 CFR 261.252)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are reactive or ignitable wastes rendered non-reactive or non-ignitable before adding to a pile? (40 CFR 265.256(a)(1))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
a. Indicate if waste is:				
Ignitable <input type="checkbox"/> OR				
Reactive <input type="checkbox"/>				
M. Land Treatment: (Subpart M) (R 428)				
1. Is waste analyzed according to 40 CFR 265.273? 40 CFR 265.13)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are food chain crops grown at the facility? (R 428(4))	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. If yes, has the owner/operator addressed the requirements of 40 CFR 265.276 and R 428(4)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
4. Are records kept regarding application dates, rates, quantities, and locations of all hazardous waste placed in the facility? (40 CFR 265.279) (R 901(2)(c))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (40 CFR 265.281)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Is the pH of the soil maintained at between 6.5 and 8.0? (R 428(2)(e))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
N. Landfills: (Subpart N) (R 415-420)				
1. Does the owner/operator have a map showing the exact location and dimensions of each cell? (40 CFR 265.309(a)) (R 420(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2. Does the operating record show the contents of each cell? (40 CFR 265.309(b)) (R 420(2))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3. Does the facility receive ignitable or reactive waste? (R 420(3))	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

*NA should be followed by a remark.